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## DEPARTMENT OF NATURAL RESOURCES

Stevens T. Mason Building, P.O. Box 30028, Lansing, MI 48909  
ROLAND HARMES, Director

April 28, 1994

Ms. Leah Evison (HSRW-6J)  
Remedial Project Manager  
U.S. EPA - Region V  
77 West Jackson Blvd.  
Chicago, IL. 60604

US EPA RECORDS CENTER REGION 5



Dear Ms Evison:

Subject: Albion-Sheridan Township Landfill Superfund Site, Calhoun County,  
Michigan.

The Michigan Department of Natural Resources (MDNR) has completed its review of the Draft Presumptive Remedy Feasibility Study. Comments are listed below.

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- 1) ARARs section - We have reviewed this section and have found that our comments that were listed in our letter to you dated February 8, 1994 were adequately addressed. Thank you.
- 2) 3-3 Last para - Third line - Please indicate here that the EPA performed the geophysical surveys listed. Please also indicate that the MDNR conducted a magnetometer survey which resulted in the identification of anomalies which the MDNR deemed indicative of potential hot spots.
- 3) 3-12 - One or both of the alternatives 1 and 2 should include a frost protection layer of at least 18" of suitable materials. Without a frost protection layer, the clay has little or no chance of maintaining its integrity as a moisture barrier without the frost protection above it. Failure of the clay layer is almost guaranteed, and many more dollars would be needed to correct the problem.
- 4) 3-18 - 3.4.3.6.1 - First para - Any addition of any "reagent" will need careful review by the MDNR Waste Management Division for concerns regarding the entry of foreign substances to the aquifer. If this portion of the remedy is selected, we can work closely with you to facilitate the review.

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- 5) 3-20 - 3.4.3.6.4 - I would appear that the remedy will be selected prior to the necessary bench/pilot studies that will be necessary. Is there enough data available out there that could shed some light on what is the fate of arsenic that has flocced out of solution and been deposited in the aquifer formation, such as the Marshall Sandstone? Could this flocculent possibly plug the pore spaces within the formation? This might be worth some minimal investigation prior to a full commitment to a particular remedy.
- 6) 4-1 - 4.2.1 - Again, these two alternatives should include the installation of a frost protection layer of at least 18". We realize that the new Act 641 rules don't require this amount of frost protection, but existing data and common sense should tell us that without the frost protection, we're liable to be wasting a lot of dollars installing a remedy that is doomed to failure from the start.
- 7) 4-2 - 4.3 - Since the MDNR has discovered drums of unknown materials near the surface, could you please add a statement to this affect in this first paragraph and wherever else in the document it is relevant.

5-8 - 5.2.2 - Please see comment number 6 above.

5-14 - 5.2.5 - Does this alternative apply to surficial drums only or to both surficial and buried pockets of drums? If it applies only to surficial drums, another alternative needs to be listed and evaluated that would cover removal of pockets of drums containing liquids and/or materials that exceed TCLP or LDR limits.

If you have any questions, feel free to contact me.

Sincerely,



Gene L. Hall  
Superfund Section  
Environmental Response Division  
517-373-6808

cc: Ms. Claudia Kerbawy, MDNR  
Mr. Jim Myers, MDNR  
Mr. Bob Delaney, MDNR  
Albion-Sheridan file (U1)